

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re: James Jones

 Debtor.

) Case Number: 19-14413
) Chapter 13 Proceedings
) Judge Arthur I. Harris

TRUSTEE'S OBJECTION TO DEBTOR'S MOTION TO MODIFY CHAPTER 13 PLAN

Now comes LAUREN A. HELBLING, the duly appointed and qualified Standing Chapter 13 Trustee herein, by and through counsel, and hereby files this objection to the motion to modify Chapter 13 plan of the Debtor(s) filed on or about October 2, 2020. In support of her objection, the Trustee makes the following representations to the Court:

1. The Trustee objects to the Debtor's motion for the following reasons:
 - a. The proposed plan does not address the funding deficiency that is the basis for the Trustee's pending motion to dismiss the Debtor's case.
2. The Trustee reserves the right to amend and/or supplement her objection, should additional information be provided.

WHEREFORE your Trustee, being a proper party in interest, hereby moves this Honorable Court to sustain her objection and deny the motion of the Debtor(s) for the reasons cited.

/S/ Philip D. Lamos

PHILIP D. LAMOS (#0066844)

Attorney for Lauren A. Helbling, Chapter 13 Trustee

200 Public Square, Suite 3860

Cleveland OH 44114-2321

Phone: (216) 621-4268 Fax: (216) 621-4806

ch13trustee@ch13cleve.com

CERTIFICATE OF SERVICE

I certify that on October 27, 2020, a true and correct copy of the Trustee's Objection to Motion to Modify Chapter 13 Plan was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Eric Ashman, on behalf of James Jones, Debtor at EricA@amourgis.com

And by regular U.S. mail, postage prepaid, on:

James Jones, Debtor at 19015 Van Aken Blvd., #514, Shaker Heights, Ohio 44122

/S/ Philip D. Lamos

PHILIP D. LAMOS (#0066844)

Attorney for Lauren A. Helbling, Chapter 13 Trustee

200 Public Square, Suite 3860

Cleveland OH 44114-2321

Phone: (216) 621-4268 Fax: (216) 621-4806

ch13trustee@ch13cleve.com

PL:kb

10/27/20